

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

HEARING: April 30, 2025 (11:00 a.m.)
OBJECTIONS: April 16, 2025 (5:00 p.m.)

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In re HELEN RACANELLI,	:	Case No. 16-22617-SHL
Debtor.	:	(Chapter 11)
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In re JOSEPH T. GRANCHELLI,	:	Case No. 18-23674-SHL
Debtor.	:	(Chapter 11)
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**NOTICE OF HEARING ON MOTION, AND UNITED STATES TRUSTEE’S MOTION
FOR ORDER: (I) VACATING ORDER AUTHORIZING EMPLOYMENT OF
DEBTOR’S COUNSEL, LINDA M. TIRELLI, ESQ, (II) REQUIRING RETURN
OF ALL FEES PAID; AND (III) IMPOSING SANCTIONS**

**TO: THE HONORABLE SEAN H. LANE,
UNITED STATES BANKRUPTCY JUDGE:**

PLEASE TAKE NOTICE that upon the within motion and memorandum of law, William K. Harrington, the United States Trustee for Region 2 (“United States Trustee”), will move and hereby does move (“Motion”) this Court, before the Honorable Sean H. Lane, United States Bankruptcy Judge, in the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York, **on April 30, 2025, at 11:00 a.m.**, or as soon thereafter as counsel can be heard, for an order: (I) vacating the orders authorizing the retention and employment of Linda M. Tirelli’s Esq., as counsel to the debtors and debtors in possession in each of the chapter 11 cases captioned above; (II) requiring the return of all fees for legal services paid to Ms. Tirelli in each of the cases; and (III) imposing sanctions against Ms. Tirelli in the discretion of the Court, and for such other and further relief as this Court may deem just and proper. The Motion is made pursuant to 11 U.S.C. §§ 327, 330 and 105, Federal Rules of Bankruptcy Procedure 2014(a) and 9024, Federal Rule of Civil Procedure 60(b)(6), Connecticut and New York Rules of Professional Conduct 3.3 and 8.4, and the Court’s inherent authority.

PLEASE TAKE FURTHER NOTICE, that parties wishing to appear at the hearing, whether making a “live” or a “listen only” appearance before the Court, must make an electronic appearance using the Electronic Appearance portal located at the Court’s website at: [USBC-SDNY \(uscourts.gov\)](https://usbc-sdny.uscourts.gov). Appearances must be entered no later than April 29, 2025, at 4:00 p.m. (prevailing Eastern time). After this deadline has passed, parties who have made their electronic appearance through the Court’s website to appear via Zoom for Government will receive an invitation from the Court with a Zoom link that will allow them to attend the hearing. Requests to receive a Zoom link should not be emailed to the Court, and the Court will not respond to late requests that are submitted on the day of the hearing. Further information on the use of Zoom for Government can be found at the Court’s website at: [Zoom Video Hearing Guide | Southern District of New York | United States Bankruptcy Court \(uscourts.gov\)](https://usbc-sdny.uscourts.gov/zoom-video-hearing-guide).

PLEASE TAKE FURTHER NOTICE, that objections or other responses, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules of the Southern District of New York, (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court’s case filing system must file electronically, and all other parties in interest must file on a 3.5-inch disk (preferably in Portable Document Format, or PDF, WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard-copy form directly to the chambers of the Honorable Sean H. Lane, and (e) be served upon the United States Trustee, Alexander Hamilton Custom House, Room 534, New York, New York 10004 (Attn: Andrew D. Velez-Rivera), **no later than the return date set forth above, April 16, 2025 (5:00 p.m.)**. Such papers shall conform to the Federal Rules of Civil Procedure and identify the party on

whose behalf the papers are submitted, the nature of the response, and the basis for such response.

Dated: New York, New York
March 12, 2025

Respectfully submitted,

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE

By: /s/ Andrew D. Velez-Rivera
Trial Attorney
Office of the U.S. Trustee
Alexander Hamilton Custom House
One Bowling Green, Room 534
New York, New York 10004
Tel. (212) 510-0500; Fax (212) 668-2255

CERTIFICATE OF SERVICE

STATE OF NEW YORK)
 : ss
COUNTY OF NEW YORK)

I, Andrew D. Velez-Rivera, hereby declare, under penalty of perjury under the laws of the United States of America, and pursuant to 28 U.S.C. § 1746, that on March 12, 2025, I caused to be served a copy of the Notice of Hearing on Motion, and United States Trustee’s Motion for Order: (I) Vacating Order Authorizing Employment of Debtor’s Counsel, Linda M. Tirelli, Esq., (II) Requiring Return of All Fees Paid, and (III) Imposing Sanctions (“Motion”), the Memorandum of Law in Support of the Motion, and the Declaration of Andrew D. Velez-Rivera in Support of the Motion, by regular mail upon each of the parties listed on the attached service list by depositing true copies of same in sealed envelopes, with postage pre-paid thereon, in an official depository of the United States Postal Service within the City and State of New York.

Dated: New York, New York

/s/ Andrew D. Velez-Rivera

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